

Honeywell
101 Constitution Ave NW
Washington, DC 20001

October 14, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Next Generation Air-Ground Petition for Rulemaking, RM-11640

Dear Ms. Dortch:

Honeywell supports the Petition for Rulemaking to Establish a Next-Generation Air-Ground Communications Service on a Secondary Licensed Basis in the 14.0 to 14.5 GHz Band ("Petition") as proposed by Qualcomm Incorporated in their filing with the Federal Communications Commission ("FCC") on July 7, 2011.

Honeywell is a leader in providing communication systems to aircraft for use by the crew and the passengers, to ensure safe operation of the aircraft, as well as information and entertainment to the passengers.

Honeywell has a long legacy of providing satellite-based communications systems to aircraft, both at L-Band and Ku-band. Honeywell's subsidiary, EMS Aviation, through its facility in Moorestown, New Jersey, provides the majority of the avionics that is used to support the Aircell GoGo service for US Airlines, an Air-to-Ground service in the UHF band. Honeywell's customers demand high quality service, and we believe that the tremendous capacity of this new service will increase the quality of service, by relieving congestion without interfering with existing services.

Honeywell agrees with the central premise of the petition – that U.S. travelers increasingly want and need to have broadband access while they are in-flight. As the Petition makes clear, broadband access via smartphones, tablets, e-readers, and laptops, is becoming increasingly essential to American consumers, both on the ground and in the air. As a result, travelers are in need of anywhere/anytime broadband access, including when they are flying on an airplane above the continental U.S.

Finally, the Next Generation Air-Ground system proposed by Qualcomm will successfully co-exist with existing satellite operations in the 14.0 to 14.5 GHz band by using advanced transceiver and antenna designs and by managing access to the spectrum in a way that will avoid harmful interference with existing services.

For these reasons, Honeywell strongly encourages the FCC to issue a Notice of Proposed Rulemaking proposing to establish the Next Generation Air-Ground Service at 14.0 to 14.5 GHz using the technology described in the Qualcomm petition.

Sincerely,

Chris Benich
Vice President, Aerospace Regulatory Affairs